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Attorney for the United States

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	CR-12-0459 EMC
	)	
Plaintiff,	)	STIPULATION AND [PROPOSED]
	)	ORDER EXCLUDING TIME UNDER
	)	THE SPEEDY TRIAL ACT
v.	)	
	)	
MYRA B. MINKS, TIFFANY T. CONLEY,	)	
LETITIA R. MAYS, and ANDREA C.	)	
MOHR,	)	
	)	
Defendants.	)	
	)	

The above-captioned matter came before the Court on August 29, 2012, for initial status conference. The United States was represented by AUSA Tom Stevens. Defendant Minks was represented by Gail Shifman, defendant Conley was represented by Tim Crudo, defendant Mays was represented by Ms. Shifman, specially appearing for Mays' counsel, Brian Berson, and defendant Mohr was represented by Brendan Conroy. The Court set the case for a further status conference on November 7, 2012.

Based upon the discovery produced by the government to the defendants, the Court, during

**STIP. AND [PROPOSED] ORDER RE: STA**  
CR-12-0459 EMC

the August 29 status conference, made findings that the time from and including August 29, 2012, (which was the date through which a prior time exclusion ran), through and including November 7, 2012, should be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), because the ends of justice served by taking such action outweighed the best interest of the public and defendants in a speedy trial. The findings were based upon the need for the defendants and the government to have reasonable time necessary for effective preparation pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv).

The parties hereby agree, and request, that the exclusion of time described above, be granted. The parties agree and stipulate that the additional time is appropriate and necessary under Title 18, United States Code, § 3161(h)(7)(A), because the needs of justice served by the continuance outweigh the best interest of the public and the defendants in a speedy trial. This time exclusion will allow counsel for the defendants and the government effectively to prepare, taking into account the exercise of due diligence.

SO STIPULATED.

DATED: August 30, 2012

MELINDA HAAG  
United States Attorney

/s  
\_\_\_\_\_  
Thomas E. Stevens  
Assistant United States Attorney

DATED: August 30, 2012

/s  
\_\_\_\_\_  
Gail Shifman  
Counsel to Myra Minks

DATED: August 30, 2012

/s  
\_\_\_\_\_  
Timothy Crudo  
Counsel to Tiffany Conley

DATED: August 30, 2012

/s  
\_\_\_\_\_  
Brian Berson  
Counsel to Letitia Mays

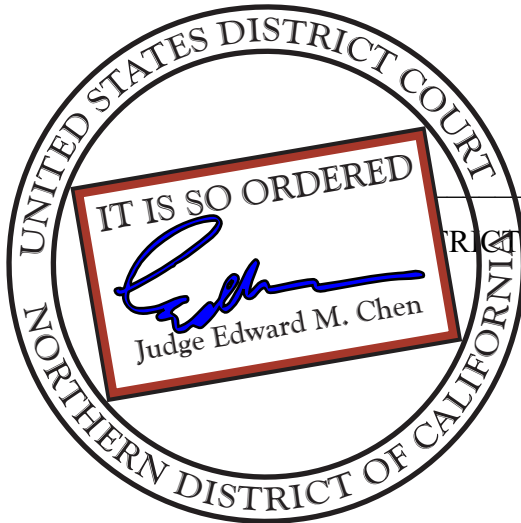
DATED: August 30, 2012

/s  
\_\_\_\_\_  
Brendan Conroy  
Counsel to Andrea Mohr

[PROPOSED] ORDER

IT IS SO ORDERED.

DATED: August <sup>30</sup>\_\_\_\_, 2012



\_\_\_\_\_  
DISTRICT JUDGE